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Attorneys for Coretronic Corporation and
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SEIKO EPSON CORPORATION,
Plaintiff,

v.

CORETRONIC CORPORATION and
OPTOMA TECHNOLOGY, INC.,
Defendants.

AND RELATED COUNTERCLAIMS

Case Nos. C 06-6946, 07-6055 MHP

**STIPULATION AND ~~PROPOSED~~ ORDER
AMENDING INVALIDITY BRIEFING
SCHEDULE**

1 WHEREAS the parties agreed to a proposed schedule for completion of invalidity fact
2 discovery and for briefing and submitting motions for summary judgment as to the invalidity and
3 unenforceability of the asserted patents and submitted that schedule to the Court in the Joint Report
4 filed on June 13, 2008 (Doc. 199) and at the hearing on June 16, 2008;

5 WHEREAS the Court adopted that schedule, which was reflected in the Court's Minute Order
6 of June 16, 2008 (Doc. 200);

7 WHEREAS the schedule contemplated an invalidity fact discovery cutoff date of July 31,
8 2008, with motions for summary judgment as to invalidity to be filed by August 15, 2008;

9 WHEREAS at the time the parties agreed to that schedule the primary remaining discovery
10 expected was depositions of Seiko Epson Corporation (SEC) and Epson America, Inc. (EAI) noticed
11 by Coretronic Corporation, to be held after the completion of production of electronic documents and
12 e-mails sought by Coretronic then underway;

13 WHEREAS the volume of such electronic discovery has been unexpectedly large and the
14 necessary processing of that discovery has been unexpectedly time consuming;

15 WHEREAS the parties have been proceeding expeditiously to complete that discovery, but
16 have not been able to complete the processing of the documents in time to proceed with the
17 depositions by the currently scheduled invalidity fact discovery cutoff date; and

18 WHEREAS the parties have therefore agreed to a limited extension of the discovery schedule
19 and a corresponding extension of the briefing and argument schedule for the invalidity summary
20 judgment motions as reflected below.

21 NOW, THEREFORE, THE PARTIES STIPULATE AND ASK THE COURT FOR AN
22 ORDER AS FOLLOWS:

23 1. Vacating the schedule set in the Minute Order of June 16, 2008;
24 2. Setting the date for completion of invalidity fact discovery as September 12, 2008;
25 3. Setting the briefing and argument schedule for the invalidity and unenforceability
26 summary judgment motions as follows:

27 Motions to be filed by September 26, 2008;

28 Oppositions to be filed by October 20, 2008;

Replies to be filed by November 3, 2008;

Motions to be heard at 2:00 p.m. on November 17, 2008.

DATED: July 25, 2008

Respectfully submitted,

/s/
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Elizabeth H. Rader (CA Bar No. 184963)
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Research & Development Corporation and
Epson America, Inc.

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of
perjury that concurrence in the filing of this document has been obtained from Elizabeth H. Rader.

Dated: July 25, 2008

THELEN REID BROWN RAYSMAN & STEINER LLP

By: /s/
Christopher L. Ogden, Esq.
(State Bar No. 235517)

Attorneys for Seiko Epson Corporation

1 Having considered the parties' statements and stipulations set forth above, and good cause
2 appearing therefore, IT IS HEREBY ORDERED THAT:

- 3 1. The schedule set in the Minute Order of June 16, 2008 is hereby VACATED;
4 2. The date for completion of invalidity fact discovery is set as September 12, 2008;
5 3. The briefing and argument schedule for the invalidity and unenforceability summary
6 judgment motions is set as follows:

7 Motions to be filed by September 26, 2008;

8 Oppositions to be filed by October 20, 2008;

9 Replies to be filed by November 3, 2008;

10 Motions to be heard at 2:00 p.m. on November 17, 2008.

11
12
13 Dated: 7/30, 2008

